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MAR 11 2019

Clerk, U.S. District Court
Ketchikan, AK

**IN AND FOR THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

(U.S. District Court, 648 Mission Street, Rm 507, Ketchikan, AK 99901)

)
)
Ronald Satish Emrit,)
)
Plaintiff) C.A. No.: _____
v.)
)
President Donald Trump,)
)
)
United States Department)
of Agriculture (USDA),)
)
)
)
United States Department of)
Commerce,)
)
Federal Trade Commission)
(FTC),)
)
&)
)
International Trade Commission)
(ITC),)
Defendants)

COMPLAINT

COMES NOW, the plaintiff Ronald Satish Emrit, who is bringing these causes of action against the five governmental defendants in the executive branch of the federal

government. The plaintiff fully expects that his law school classmate Raven Liberty, Esquire of Miami-Dade County, FL will be making a "Notice of Appearance of Counsel" if and when discovery is compelled by the magistrate judge and/or presiding judge in the particular case at bar. In bringing forth these causes of action, the plaintiff states, avers, and alleges the following:

I.) NATURE OF THE CASE

- 1.) The plaintiff alleges that the five defendants have committed the tortious interference with business relations/contracts by imposing ridiculous tariffs on Chinese exports that have no other impact on the American economy than to produce inflation or stagflation similar to the Zimbabwe economy under President Robert Mugabe. Let it be known that the self-proclaimed "Ogmios" (of Nostradamus' famous quartets and the opposite of "Mabus") aka Saint Ronald of Soapstone (SROS) states that "By increasing the velocity of money, a nation can increase its Gross Domestic Product (GDP), reduce frictional, cyclical, and structural unemployment from a macroeconomic perspective, and quite possibly minimize the possibility of inflation, recession, or stagflation." The Bureau of Economic Analysis (BEA) under the Department of Commerce and Bureau of Labor Statistics (BLS) under the Department of Labor measure consumer price index (CPI) and the GDP deflator which are key benchmarks that are correlated to inflation.
- 2.) While President Donald Trump may be trying to safeguard and/or protect intellectual property in America by imposing tariffs on Chinese goods (many of which are counterfeit goods or "knockoffs" of patented, trademarked, or copyrighted American goods), the tariffs on Chinese exports also make it more difficult for companies in Silicon Valley to get the necessary components of their hardware to produce their own copyrighted software.
- 3.) The components of their central processing units (CPU's) would include many semiconductors, transistors, rectifiers, and other electronic goods from China which are much cheaper than American goods and therefore give these Silicon Valley companies the "economies of scale" to provide valuable goods and

services at a low-cost price to contribute significantly to American Gross Domestic Product (GDP).

- 4.) President Trump may be trying to invoke complicated laws of Admiralty and International Trade including but not limited to Trade-Related Aspects of Intellectual Property (TRIPS), the General Agreement on Tariffs and Trade (GATT) and the Bretton Woods Agreement, the Jones Act for negligence and seaworthiness of those vessels coming from Chinese ports bringing Chinese exports, anti-dumping laws, laws applicable to INCOTERMS, the Harter Act, Death on High Seas Act (DOHSA), Hague-Visby Amendments, compulsory licensing, and the applicable provisions of the World Intellectual Property Organization (WIPO) in Geneva, Switzerland.
- 5.) Furthermore, the plaintiff alleges that the five defendants have committed a violation of the Equal Protection Clause and Due Process Clause of the Fifth and Fourteenth Amendments to the U.S. Constitution and The Privileges and Immunities Clause (e.g. Article IV, Section 2, Clause 1 of the Constitution, i.e. the Comity Clause) since all five defendants are federal government agencies and are therefore “state actors.”
- 6.) To be more specific, all five defendants have violated the Dormant Commerce Clause and are impeding interstate commerce by imposing and enforcing these outrageous tariffs against China. The Constitution expressly states that Congress has plenary power over interstate commerce and not these executive branches of the federal government which are apparently trying to infringe upon the separation-of-powers doctrine.
- 7.) As a horrible encroachment upon public policy protecting interstate commerce, the five defendants are also unduly discriminating against those Americans that rely on “doing business” with Silicon Valley companies (such as the plaintiff).
- 8.) Nevertheless, it is President Trump who is egregiously violating the Plaintiff’s constitutional rights by trying to impose a 20-hour work-week requirement on those Americans receiving food stamps or EBT/SNAP benefits from the U.S. Department of Agriculture (USDA).
- 9.) Accordingly, the plaintiff is suing the defendants for \$80,000 (eighty thousand dollars) notwithstanding the Eleventh Amendment doctrine of sovereign immunity and the Federal Tort Claims Act (FTCA).

- 10.) The plaintiff believes in “good faith” that the five defendants would agree to be sued for pecuniary damages to ensure justice and to preclude or prevent unjust enrichment.
- 11.) The plaintiff is also suing to obtain the equitable remedy of an injunction precluding any of the five defendants from assessing tariffs on China which would cause massive drops in the stock price of Silicon Valley companies which are traded on a major stock exchange such as NASDAQ, New York Stock Exchange (NYSE), and/or Standard & Poor’s 500 (S&P 500).
- 12.) The plaintiff is also seeking a separate injunction (as an equitable remedy) which would preclude and/or enjoin President Trump or the USDA from imposing a “20-hour work-week” requirement on Americans who are receiving EBT/SNAP benefits commonly referred to as “food stamps.” In other words, the injunction would make it so that Americans do not have to work at least 20 hours per week simply to obtain these EBT/SNAP benefits or “food stamps.”
- 13.) The plaintiff is seeking to assess joint and several liability to all five of the defendants in which they are expected to seek contribution and indemnity from each other through the filing of cross-claims based on contributory negligence, pure comparative negligence, and/or modified comparative negligence (although negligence is not one of the causes of action being alleged by the plaintiff in the particular case at bar).

II.) PARTIES TO THIS LITIGATION

- 14.) The plaintiff is an indigent, disabled, and unemployed resident of the state of Nevada. His current mailing address is 6655 38th Lane East, Sarasota, FL 34243. His cell phone number is currently (301)537-8471 and his primary email address is einsteinrockstar2@outlook.com. His secondary email address is einsteinrockstar2@outlook.com.
- 15.) The first defendant is President Donald Trump. His mailing address is the following: 1600 Pennsylvania Avenue NW Washington, DC 20500. His telephone number is 202-456-1111. His email address is president@whitehouse.gov.

16.) The second defendant is the U.S. Department of Commerce. The mailing address for the Department of Commerce headquarters is the following: 1401 Constitution Ave NW Washington, DC 20230. The telephone number for the U.S. Department of Commerce headquarters is 202-482-2000. The email address for the U.S. Department of Commerce is publicaffairs@doc.gov. The Secretary of Commerce is Penny Pritzker.

17.) The third defendant is the U.S. Department of Agriculture. The mailing address for the headquarters of the SBA is the following: 1400 Independence Ave., S.W. Washington, DC 20250. The telephone number for the U.S. Department of Agriculture (USDA) is **(202) 720-2791**. The email address for the SBA is answerdesk@sba.gov. The Secretary of Agriculture is Sonny Perdue.

18.) The fourth defendant is the Federal Trade Commission (FTC). Its mailing and physical address is the following: 600 Pennsylvania Avenue, NW Washington, DC 20580. Its telephone number is **(202) 326-2222**.

19.) The fifth defendant is the International Trade Commission (ITS). Its mailing address is the following: 500 E St SW, Washington, DC 20436. The telephone number for the fifth defendant is **202.205.2000**.

III.) JURISDICTION AND VENUE

20.) According to Federal Rules of Civil Procedure 8(a)(1), Plaintiff is required to provide "a short and plain statement of the grounds for the court's jurisdiction, unless the court already has jurisdiction and the claim needs no new jurisdictional support;"

21.) Because the court does not already have personal or subject matter jurisdiction over this issue, it is necessary to engage in a brief discussion of the court's jurisdiction so that the defendants can not move to dismiss this case based on procedural grounds involving a lack of proper jurisdiction.

22.) Pursuant to 28 U.S.C.A. Section 1332, the U.S. District Court for the District of Alaska (as an Article III court) has jurisdiction over this matter because there is

complete diversity of jurisdiction between the Plaintiff and the five defendants.

23.) As an Article III court, the U.S. District Court for the District of Alaska also has subject matter jurisdiction over the present case at bar because this proceeding involves a discussion of the Equal Protection Clause, Due Process Clause, and Privileges and Immunities Clause as it relates to various federal agencies.

24.) Venue in this jurisdiction is also proper pursuant to 28 U.S.C.A. Sections 1391 and 1400.

25.) Because the amount in controversy exceeds \$75,000 (i.e. \$80,000 is greater than \$75,000), this court also has jurisdiction with regards to that particular issue.

IV.) STATEMENT OF FACTS

26.) President Trump has ominously imposed tariffs on China in what amounts to a “trade war” that affects both the citizens of China and the United States.

27.) The net effect of these tariffs on China are that they are creating inflation and quite possibly stagflation in the American economy.

28.) To offset the effects of inflation, the Federal Reserve Bank and its chairman Jerome Powell will have to engage in the opposite of quantitative easing (QE), i.e. they will have to remove paper money or “legal tender” from the economy by selling bonds, Treasury bills (i.e. T-Bills) and other forms of commercial paper/negotiable instruments to commercial banks most of which are insured by the Federal Deposit Insurance Company or FDIC (which was created by the black-letter law of the Glass-Steagall during the era of New Deal Legislation of FDR after the Great Depression and Stock Market Crash of 1929).

29.) This process involving quantitative easing (QE) is widely referred to as “open market operations” and this is the protocol of the 12 regional banks of the Federal Reserve and the Federal Open Market Committee (FOMC).

30.) The National Mint used to be under the State Department but now the National Mint and Bureau of Engraving and Printing (BEP) are under the Treasury Department and its Secretary Steve Mnuchin.

31.) Under normal circumstances, the Federal Reserve Bank engages in Quantitative Easing (QE) and introduces legal tender from the Bureau of Engraving and Printing (BEP) to commercial banks through the process of buying bonds, T-bills, and other forms of commercial paper/negotiable instruments from commercial banks and FDIC-insured banks.

32.) President Trump's tariffs on China also raise the price of Chinese exports to the United States (regulated by Secretary Wilbur Ross and the U.S. Department of Commerce) including but not limited to semiconductors, integrated circuits, rectifiers, transistors, field-effect transistors, bipolar junction transistors, MOSFET's, CMOS's, etc..

33.) Technology companies in Silicon Valley utilize these Chinese exports and these companies include but not are limited to Apple, Amazon, Google (and its parent company Alphabet), Facebook, etc..

34.) By imposing tariffs on Chinese exports to the United States, President Trump is negatively affecting the net income, retained earnings, and quarterly dividends of Silicon Valley technology companies and therefore President Trump is negatively affecting the earnings per share (EPS) and price/earnings ratios of their stocks traded daily in NASDAQ, New York Stock Exchange (NYSE), and/or Standard & Poor's 500 (S & P 500).

**V.) COUNT ONE: TORTIOUS INTERFERENCE WITH BUSINESS
RELATIONS/CONTRACTS**

35.) A plaintiff must establish four elements in order to state a *prima facie* cause of action for tortious interference with an existing contract:

a.) Existence of a valid contractual relationship or business expectancy;

- b. Knowledge of the contractual relationship or expectancy by the defendant;
- c.) Intentional interference inducing or causing a breach or termination of the contractual relationship or expectancy; and
- d.) Resultant damage to the party whose contractual relationship or expectancy has been disrupted.

36.) The plaintiff's albums "Welcome to Atlantis," "Unleash the Beast," "Rough Draft of Publicity Stunts," and "The Very Best of Satish Dat Beast" appear to be distributed on the platforms of Apple Music, itunes (owned by Apple), Google Play, Amazon, Facebook, Spotify, Deezer, and other virtual stores (with no physical storefront) through digital distribution companies such as Ditto Music (of the United Kingdom), Mondotunes (of Huntington Beach, CA), CD Baby (of Portland, OR), Distrokid, Loudr, and Tunecore (of Brooklyn, NY).

37.) Because of the fact that the plaintiff's albums are distributed to the websites owned and operated by Silicon Valley companies through digital distribution, it can be stated with substantial certainty that the plaintiff is in "privity of contract" with a plethora of Silicon Valley technology companies.

38.) Therefore, President Trump's tariffs on Chinese exports will ultimately have a negative effect on the sales of the plaintiff's mp3's, CD's, ringtones, and music videos which are distributed to stores and websites owned and operated by Silicon Valley technology companies (with no official brick and mortar locations) due to the fact that President Trump's tariffs on Chinese exports are raising Operating Expenses in addition to Selling, General, and Administrative Expenses on the Income Statements maintained by certified public accountants (CPA's) of these Silicon Valley firms.

39.) President Trump's tariffs on Chinese exports will also raise the costs of Plant, Property, and Equipment (under fixed assets) in addition to Inventory, Accounts Payable, and Notes Payable (under current assets) on the Balance Sheets of Silicon Valley companies which are drafted according to generally-accepted accounting principles (GAAP).

40.) To reiterate, the fact that the plaintiff's music is being sold on websites owned and operated by Silicon Valley companies indicates that it can be stated with substantial certainty that the plaintiff is in "privity of contract" with Amazon, Google, Spotify, Deezer, Apple Music/itunes, Tidal (i.e. Jay Z's company), etc..

41.) Therefore, by imposing tariffs on Chinese exports, President Trump is tortiously interfering with the plaintiff's contracts and business relations with Silicon Valley tech companies including but not limited to Amazon, Google, Facebook, Apple Music/itunes, Tidal, etc..

VI.) COUNT TWO: VIOLATION OF THE EQUAL PROTECTION CLAUSE

42.) The Equal Protection Clause is part of the Fourteenth Amendment to the United States Constitution. The clause, which took effect in 1868, provides that no state shall deny to any person within its jurisdiction "the equal protection of the laws".

43.) A primary motivation for this clause was to validate the equality provisions contained in the Civil Rights Act of 1866, which guaranteed that all people would have rights equal to those of all citizens. As a whole, the Fourteenth Amendment marked a large shift in American constitutionalism, by applying substantially more constitutional restrictions against the states than had applied before the Civil War.

44.) The meaning of the Equal Protection Clause has been the subject of much debate, and inspired the well-known phrase "Equal Justice Under Law". This clause was the basis for *Brown v. Board of Education* (1954), the Supreme Court decision that helped to dismantle racial segregation, and also the basis for many other decisions rejecting discrimination against people belonging to various groups.

45.) The Equal Protection Clause itself applies only to state and local governments. However, the Supreme Court held in *Bolling v. Sharpe* (1954) that equal protection requirements apply to the federal government through the Due Process Clause of the Fifth Amendment.

46.) Because of the fact that the plaintiff is mixed with African-American and East Indian/South Asian, it can be stated that the plaintiff is a member of a suspect classification of discrete and insular minorities which have suffered invidious discrimination within the context of American jurisprudence.

47.) Due to the fact that the plaintiff is part of a suspect classification, it can be stated with substantial certainty that President Trump's proposed executive order affecting EBT/SNAP benefits and Social Security disability benefits must pass a strict scrutiny test in which the proposed executive order and/or legislation must be narrowly-tailored to a compelling government objective with regards to the plaintiff's equal protection rights and his property interests in those EBT/SNAP and Social Security disability benefits.

48.) President Trump's proposed executive order and/or legislation affecting millions of Americans' EBT/SNAP benefits and Social Security disability benefits is not narrowly-tailored to any compelling government objective, particularly since his proposed executive order and/or legislation is designed to do nothing else other than

provide a tax cut for the wealthy and to penalize the poor and disenfranchised groups since it has been proven that President Trump is a well-known racist trying to build a wall to prevent Mexicans from coming into the country.

49.) President Trump has also shown that he is racist against African-Americans by trying to advocate for the prosecution of innocent black men in an incident involving a homicide in the Central Park section of Manhattan; President Trump has also tried to exclude black people and other minorities from taking up residence in his properties and/or real estate ventures.

50.) As such, any executive orders and/or legislation proposed by President Trump should be promptly blocked by district court judges and he should be impeached by the Democratic House of Representatives and Republican Senate and/or removed from office through use of the 25th Amendment and his blatant violations of the seldom-used Logan Act and Posse-Comitatus Act (which he violated by trying to use the military and troops at the Southern border to block a caravan).

VII.) COUNT THREE: VIOLATION OF THE DUE PROCESS CLAUSE

51.) The Fifth and Fourteenth Amendments to the United States Constitution each contain a due process clause. Due process deals with the administration of justice and thus the due process clause acts as a safeguard from arbitrary denial of life, liberty, or property by the Government outside the sanction of law.

52.) The Supreme Court of the United States interprets the clauses more broadly because these clauses provide four protections: procedural due process (in civil and criminal proceedings), substantive due process, a prohibition against vague laws, and as the vehicle for the incorporation of the Bill of Rights. Due process ensures the rights and equality of all citizens.

53.) The Supreme Court has interpreted the due process clauses in the Fifth and Fourteenth Amendment identically, as Justice Felix Frankfurter once explained in a concurring opinion: "To suppose that 'due process of law' meant one thing in the Fifth Amendment and another in the Fourteenth is too frivolous to require elaborate rejection." In 1855, the Supreme Court explained that, to ascertain whether a process is due process, the first step is to "examine the constitution itself, to see whether this process be in conflict with any of its provisions..."

54.) Also in 1855, the U.S. Supreme Court said, "The words, 'due process of law,' were undoubtedly intended to convey the same meaning as the words, 'by the law of the land,' in Magna Charta." And, the Court said this in the 1884 case of *Hurtado v. California*.

55.) Due process of law in the [Fourteenth Amendment] refers to that law of the land in each state which derives its authority from the inherent and reserved powers of the state, exerted within the limits of those fundamental principles of liberty and justice which lie at the base of all our civil and political institutions, and the greatest security for which resides in the right of the people to make their own laws, and alter them at their pleasure.

56.) Due process also applies to the creation of taxing districts, as taxation is a deprivation of property. Due process typically requires public hearings prior to the creation of a taxing district.

57.) Because of the fact that the plaintiff is mixed with African-American and East Indian/South Asian, it can be stated that the plaintiff is a member of a suspect

classification of discrete and insular minorities which have suffered invidious discrimination within the context of American jurisprudence.

58.) Due to the fact that the plaintiff is part of a suspect classification, it can be stated with substantial certainty that President Trump's proposed executive order affecting EBT/SNAP benefits and Social Security disability benefits must pass a strict scrutiny test in which the proposed executive order and/or legislation must be narrowly-tailored to a compelling government objective with regards to the plaintiff's equal protection rights and his property interests in those EBT/SNAP and Social Security disability benefits.

59.) President Trump's proposed executive order and/or legislation affecting millions of Americans' EBT/SNAP benefits and Social Security disability benefits is not narrowly-tailored to any compelling government objective, particularly since his proposed executive order and/or legislation is designed to do nothing else other than provide a tax cut for the wealthy and to penalize the poor and disenfranchised groups since it has been proven that President Trump is a well-known racist trying to build a wall to prevent Mexicans from coming into the country.

60.) President Trump has also shown that he is racist against African-Americans by trying to advocate for the prosecution of innocent black men in an incident involving a homicide in the Central Park section of Manhattan; President Trump has also tried to exclude black people and other minorities from taking up residence in his properties and/or real estate ventures.

61.) As such, any executive orders and/or legislation proposed by President Trump should be promptly blocked by district court judges and he should be impeached by

the Democratic House of Representatives and Republican Senate and/or removed from office through use of the 25th Amendment and his blatant violations of the seldom-used Logan Act and Posse-Comitatus Act (which he violated by trying to use the military and troops at the Southern border to block a caravan).

62.) Nevertheless, the plaintiff's substantive and procedural due process rights are being infringed upon by President Trump's attempts to remove EBT/SNAP benefits and Social Security disability benefits accordingly without a notice and hearing and an opportunity to appeal such a decision to an Administrative Law Judge (ALJ) and in accordance with the Administrative Procedures (APA).

VIII.) COUNT FOUR: VIOLATION OF THE PRIVILEGES AND IMMUNITIES CLAUSE

63.) In the federal circuit court case of *Craig v. Coyle*, Justice Bushrod Washington wrote that the protections provided by the clause are confined to privileges and immunities which are, "in their nature, fundamental; which belong, of right, to the citizens of all free governments; and which have, at all times, been enjoyed by the citizens of the several states which compose this Union, from the time of their becoming free, independent, and sovereign."

64.) In his explanation of the scope of the rights protected by the clause, Justice Washington included the right to travel through states, the right of access to the courts, the right to purchase and hold property, and an exemption from higher taxes than state residents pay.

65.) The *Craig v. Boren* case involved the rights of an out-of-state citizen, rather than the rights of an in-state citizen, and Justice Washington's opinion did not suggest that this provision of the Constitution addresses how a legislature must treat its own citizens.

66.) Another pertinent federal circuit court case was decided by Justice Henry Baldwin, who succeeded Justice Washington. In the case of *Magil v. Brown*, Justice Baldwin addressed the Privileges and Immunities Clause: "We must take it therefore as a grant by the people of the state in convention, to the citizens of all the other states of the Union, of the privileges and immunities of the citizens of this state."

67.) The plaintiff argues that all five of the defendants have committed a blatant violation of the Privileges and Immunities Clause of Article IV, Section 2, Clause 1 of the U.S. Constitution (i.e., the Comity Clause).

68.) Because of the fact that the plaintiff is mixed with African-American and East Indian/South Asian, it can be stated that the plaintiff is a member of a suspect classification of discrete and insular minorities which have suffered invidious discrimination within the context of American jurisprudence.

69.) Due to the fact that the plaintiff is part of a suspect classification, it can be stated with substantial certainty that President Trump's proposed executive order affecting EBT/SNAP benefits and Social Security disability benefits must pass a strict scrutiny test in which the proposed executive order and/or legislation must be narrowly-tailored to a compelling government objective with regards to the plaintiff's equal protection rights and his property interests in those EBT/SNAP and Social Security disability benefits.

70.) President Trump's proposed executive order and/or legislation affecting millions of Americans' EBT/SNAP benefits and Social Security disability benefits is not narrowly-tailored to any compelling government objective, particularly since his proposed executive order and/or legislation is designed to do nothing else other than provide a tax cut for the wealthy and to penalize the poor and disenfranchised groups since it has been proven that President Trump is a well-known racist trying to build a wall to prevent Mexicans from coming into the country.

71.) President Trump has also shown that he is racist against African-Americans by trying to advocate for the prosecution of innocent black men in an incident involving a homicide in the Central Park section of Manhattan; President Trump has also tried to exclude black people and other minorities from taking up residence in his properties and/or real estate ventures.

72.) As such, any executive orders and/or legislation proposed by President Trump should be promptly blocked by district court judges and he should be impeached by the Democratic House of Representatives and Republican Senate and/or removed from office through use of the 25th Amendment and his blatant violations of the seldom-used Logan Act and Posse-Comitatus Act (which he violated by trying to use the military and troops at the Southern border to block a caravan).

73.) The plaintiff would like to further articulate that receiving EBT/SNAP benefits and Social Security disability benefits is actually a right and not a privilege and therefore are more aptly protected by the Equal Protection and Due Process Clauses of the Fifth and Fourteenth Amendments.

74.) If the plaintiff's EBT/SNAP benefits and/or Social Security disability benefits are rescinded because of President Trump's unconstitutional executive orders and proposed legislation (before bicameralism and presentment), the plaintiff has no other choice other than to get recourse on the state level by taking up permanent residence in the state of California which has "general relief" (GR) for those persons that do not have disability benefits from the Social Security Administration (SSA) and/or Treasury Department (under Secretary Steve Mnuchin).

75.) In addition to California, the state of Rhode Island also provides cash assistance to those persons that have been denied of their disability benefits, and these liberal states such as California and Rhode Island have attorneys general who are likely to stand up against President Trump's fascist economic policies.

76.) The attorney general of the state of Maryland has already filed as many as 20 federal lawsuits against President Trump because his ridiculous economic and foreign policies are only designed to erase President Obama's legacy in the same manner that Napoleon was successful in removing the Negroid nose off of the sphinx in Egypt; President Trump has always been jealous of President Obama's legacy, and so President Trump seeks to undo everything that President Obama worked hard for on the global scale.

**IX.) COUNT FIVE: VIOLATION OF THE AMERICANS WITH
DISABILITIES ACT OF 1990 (ADA)**

77.) The Americans with Disabilities Act of 1990 (42 U.S.C. § 12101) is a US labor law that prohibits unjustified discrimination based on disability. It affords similar protections against discrimination to Americans with disabilities as the Civil Rights

Act of 1964, which made discrimination based on race, religion, sex, national origin, and other characteristics illegal.

78.) In addition, unlike the Civil Rights Act, the ADA also requires covered employers to provide reasonable accommodations to employees with disabilities, and imposes accessibility requirements on public accommodations.

79.) In 1986, the National Council on Disability had recommended enactment of an Americans with Disabilities Act (ADA) and drafted the first version of the bill which was introduced in the House and Senate in 1988.

80.) The final version of the bill was signed into law on July 26, 1990, by President George H. W. Bush. It was later amended in 2008 and signed by President George W. Bush with changes effective as of January 1, 2009.

81.) The plaintiff disabled due to the fact that he has been diagnosed with Post-Traumatic Stress Disorder (PTSD), bipolar disorder/manic depression, and schizoaffective disorder.

82.) By trying to rescind the EBT/SNAP benefits and Social Security disability benefits of millions of disabled Americans, President Trump is committing an egregious violation of the Americans with Disabilities Act of 1990 (ADA).

X.) COUNT SIX: VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

83.) Title VII of the Civil Rights Act of 1964 (Pub. L. 88-352) (Title VII), as amended, appears in volume 42 of the United States Code, beginning at section 2000e. Title VII prohibits employment discrimination based on race, color, religion, sex and national origin.

84.) The Civil Rights Act of 1991 (Pub. L. 102-166) (CRA) and the Lily Ledbetter Fair Pay Act of 2009 (Pub. L. 111-2) amend several sections of Title VII. In addition, section 102 of the CRA (which is printed elsewhere in this publication) amends the Revised Statutes by adding a new section following section 1977 (42 U.S.C. 1981), to provide for the recovery of compensatory and punitive damages in cases of intentional violations of Title VII, the Americans with Disabilities Act of 1990, and section 501 of the Rehabilitation Act of 1973.

85.) By trying to rescind the EBT/SNAP benefits and Social Security Disability benefits of millions of impoverished Americans (including the plaintiff) who can file a class action lawsuit pursuant to Rule 23 of the Federal Rules of Civil Procedure (FRCP), the defendants President Trump and his Cabinet-level department USDA are violating Title VII of the Civil Rights Act of 1964.

XVIII.) PRAYER FOR RELIEF

WHEREFORE, the plaintiff has brought this cause of action against the five defendants who have committed the tortious interference with business relations/contracts by imposing ridiculous tariffs upon Chinese exports which have the ultimate effect of causing the plummeting of the price of the stocks of Silicon Valley companies in the NASDAQ, NYSE, DJIA, and S&P 500. The plaintiff is also arguing that President Trump has committed a violation of the Equal Protection Clause, Due Process Clause, Privileges and Immunities Clause, Americans with Disabilities Act of 1990 (ADA), and Title VII of the Civil Rights Act of 1964.

Accordingly, the plaintiff is alleging that he should be entitled to damages in the amount of \$80,000 (eighty thousand dollars) and the equitable remedy amounting to two injunctions which preclude the five defendants from assessing tariffs on Chinese exports and which also have the effect of precluding President Trump and the USDA from requiring Americans to work at least 20 hours per week to obtain EBT/SNAP

benefits in their states. In establishing this “prayer for relief,” the plaintiff states, avers and alleges the following:

A.) The plaintiff is seeking \$80,000 (eighty thousand dollars) damages in the form of punitive, compensatory, treble, actual, special, and presumed damages from the defendant’s commission of the aforementioned tortious interference with business relations/contracts.

B.) While punitive damages are disallowed by the common law of contracts, Restatement (Second) of Contracts and/or the Uniform Commercial Code Article 2 dealing with the sale of goods in excess of \$500.00 (in which the Statute of Frauds would be applicable), the plaintiff is also seeking \$80,000 (eighty thousand dollars) of damages in the form of expectation, reliance, restitution, incidental, and consequential damages for the material breach of contract if and only if (iff) these Silicon Valley “tech” companies cease to do business with the plaintiff because they are losing money in the stock markets as a direct result of President Trump’s ridiculous tariffs on Chinese exports (monitored by Secretary Wilbur Ross and the Commerce Department).

C.) The plaintiff is also seeking the equitable remedy of an injunction in which the court will mandate that the five defendants cease to assess tariffs on Chinese exports to the United States under the guise of protecting American intellectual property but which have the ultimate effect of causing the plummeting of the stock price of Silicon Valley companies because President Trump is really “at war” with Amazon and Google for some unspecified and obscure reason.

D.) Moreover, the plaintiff in the present case at bar is seeking the equitable remedy of an injunction precluding and/or enjoining President Trump and the USDA from requiring that disabled persons work 20 hours per week simply to obtain EBT/SNAP benefits commonly referred to as “food stamps.”

E.) The concepts of unjust enrichment and quantum meruit may also be applicable to the present case at bar.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ronald Satish Emrit".

Ronald Satish Emrit

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